

GUIDELINES

ACCESSIBILITY OF FINANCIAL SERVICES

DEVELOPMENT. TECHNOLOGIES. COMPLIANCE.



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Introduction

In the process of change these guidelines will help the financial sector ensuring that the interests of all stakeholders are duly addressed, irrespective of disability or other temporary impairment. These guidelines teach us to be universal and flexible, raise awareness on diversity and public responsibility for respecting diversity.

The accessibility directive has made us reconsider processes, improve communication with organizations representing persons with disabilities and think on new technological and legal solutions to address situations that can be rather complicated at times. The overall approach that is embedded in these guidelines is to respect and explain and strive for performance that exceeds formal legal compliance whenever possible.

The implementation of the proposed solutions will be a long-term and resource intensive incentive. This is also the industry's commitment to social responsibility. Being socially responsible and inclusive also means to be more competitive, not to forget that all these factors are of critical relevance in terms of sustainability.



Sanita Bajāre

Finance Latvia Association
Chairwoman on the Board

Financial literacy and access to financial services are an integral part of everyday life. Around 100 million people in Europe and around 200 000 people in Latvia are affected by diverse functional limitations. Financial services should meet appropriate accessibility requirements to ensure that the services are easily accessible to everyone, including persons with disabilities and functional limitations – sensory, mental, intellectual or physical.

The guidelines contain practical recommendations for ensuring access to automated teller machines, online banking, authentication devices, in-person banking, service contracts and other everyday services. Comprehensible, user friendly and sustainable solutions will also improve the overall competitiveness of the financial sector.

On behalf of the Ministry of Welfare I would like to thank the Finance Latvia Association for taking the initiative and cooperation in the implementation of a single approach to accessibility matters. Through joint efforts we can build a more inclusive society where everyone is treated with respect and dignity.



Evika Siliņa

Minister of Welfare
Republic of Latvia

UN Convention on the Rights of Persons with Disabilities, the European Accessibility Act and other regulations state that accessibility is no longer each individual's sole responsibility. The task of every contemporary and inclusive society is to eliminate any obstacles and barriers hindering equal opportunities for persons with disabilities.

Independent financial decision making is of relevance for everyone. Unfortunately, limited accessibility of the physical and informative environment have been depriving persons with disabilities of living out their financial freedom, notwithstanding that many of these obstacles could be eliminated easily and without significant investments if only financial institutions would have sufficient knowledge on the needs of persons with disabilities, possibilities and best solutions.

In the light of this, I truly hope that these guidelines will be a step ahead towards better mutual understanding and will result in better accessibility of diverse financial services in the near future. These guidelines are the starting point of a dialogue that will be useful not only for persons with disabilities but for the entire society.



Gunta Anča

Latvian Umbrella Body for
Disability Organizations
SUSTENTO
Chairwoman of the Board

Inclusive design is the key for ensuring better service to all end users.

Inclusive design is a design that is based on human versatility and every aspect that makes people different from each other.

Definitions

Alternative text (abbreviated: *alt text*) means a word or a phrase that is inserted in the website's code to give a textual description of a visual item placed on the website and to provide respective content for search engines and screen viewers.

UN Convention means the United Nations Convention on the Rights of Persons with Disabilities.

Directive means the Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services.

E-commerce services means services provided at a distance, through websites and mobile device-based services by electronic means and at the individual request of a consumer with a view to concluding a consumer contract.

Assistive technology means any item, piece of equipment, service or product system including software that is used to increase, maintain, substitute or improve functional capabilities of persons with disabilities or for, alleviation and compensation of impairments, activity limitations or participation restrictions.

Consumer means any natural person who expresses the intention, purchases or could possibly purchase or use the relevant product, service, digital content or digital service for purposes which are outside his trade, business, craft or profession.

Persons with disabilities means persons who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

POS means a device (terminal) allowing a service provider or a vendor to accept contactless payments via payment cards or other means of payment (e.g. smartphones).

Universal design means a process that results in the creation of products and services accessible to people with a wide range of diverse needs: persons with functional limitations, families with children, older people etc.

Easy language means possibly easily, simplified language that is used when preparing information for persons with intellectual, neuropsychological and literacy issues. The language is not used in legal writing. Such information commonly contains only the most essential matters, is made up of short sentences and differs visually as it is usually supplemented with various graphical elements, colours, images and even video materials.

Plain language means language proficiency level B2 which guarantees that information is understood by persons not possessing special knowledge on legal affairs or financial matters. Such information contains no specific terminology or in case any specific terms are used, a comprehensive explanation must be given, the sentence structure is simple and paragraphs possibly short. Preference should be given to everyday language, simply formulated and easily perceived texts containing sequential instructions regarding the actions that should be carried out by the reader.

W3C WAI means the *World Wide Web Consortium's Web Accessibility Initiative* whose aim is to improve Web accessibility to people with disabilities.

WCAG means the *Web Content Accessibility Guidelines*.

Purpose

- 1.1. Latvia ratified the UN Convention on the Rights of Persons with Disabilities (hereinafter – the Convention) on 1 March 2010 and it is binding in Latvia since 31 March 2010. The purpose of the UN Convention is to ensure that persons with disabilities receive full and equal enjoyment of all their rights on an equal basis with others. This includes respective measures for ensuring that general private sector services are equally accessible to persons with disabilities.
- 1.2. On 17 April 2019 the European Parliament and the Council adopted the Directive (EU) 2019/882 on the accessibility requirements for products and services (hereinafter – the Directive). In order to transpose the Directive into the national legislation, a draft law on the accessibility of goods and services has been prepared. The given legal norms, among other things, oblige banks to organize their everyday work in such a manner as to make the provided financial services equally accessible to persons with disabilities (withing the meaning of Article 3(1) of the Directive) – i.e. all persons with temporary or long-term physical, mental, intellectual or sensory impairments, irrespective of whether the disability is officially approved or not.
- 1.3. The Consumer Rights Protection Law Article 3¹ states that differential treatment of service recipients based on disability is prohibited.
- 1.4. Banking clients, inter alia, may be persons with different temporary or long-term functional limitations or any specific disability, e.g. visual or hearing impairment, physical disability, intellectual development disorders, psychosocial (mental) disorders or invisible disability expressed in the form of various illnesses or functional disorders. It must be taken into consideration that not all hindrances or limitations are the same as disability. Even in case a person has no approved disability, e.g. is facing temporary functional disorders, he/she has the right to service accessibility.
- 1.5. The given legislative requirements mainly target writing of contracts and information associated therewith in easy and plain language, appropriate in-house servicing (communication, background noise, accessibility to buildings, premises, floors, visibility of notices, support persons etc.) and the possibility to receive information via several sensory channels (voice-controlled POS terminals, ATMs with voice assistance function, websites with contrast and text reading elements etc.).
- 1.6. Banking services are an important component of every person's daily life. The technological development has not only streamlined banking sector's operating efficiency making it more user friendly but has also made it crucial for the banks to adjust to changes in order to ensure equal accessibility to financial services by all, including persons with disabilities. The accessibility of financial services is among the basic preconditions for full and equal social participation of persons with disabilities. Even if some service or any its component is outsourced by contract it should not undermine service accessibility. In such case the accessibility requirements should be incorporated also in the outsourcing agreement.

- **Recognizing diversity and uniqueness:** involvement of people with versatile skills and functional limitations in the development of services will help design the most appropriate accessibility solutions. The provider of financial services has to offer several service receipt and information perception channels.
- **Inclusive process and tools:** zealously engage in project development persons with different functional limitations (e.g. visual, hearing or mental), various needs and perspectives, taking the “nothing about us without us” approach.
- **Increasing benefits:** have a clear idea of the context and environment, apply such principles as, flexibility, adaptation and personalization, think of solutions that will be beneficial to all and everyone.

- 1.7. The scope of these guidelines is to improve accessibility of financial services, possibly harmonising banking practices and enhancing legal certainty, and to give recommendations to the banks on how to best implement the requirements of external legal regulations.
- 1.8. According to the data of the Ministry of Welfare, in 2021 there were around 200 000 persons with different forms of disability in Latvia. Given that anyone can face temporary or long-term functional limitations at some stage of life, it is important to ensure compliance of financial services with the accessibility requirements which also include principles of universal design and improved customer service.
- 1.9. The task of these guidelines is to facilitate accessibility to financial services and to expand the experience of inclusion.

Summary

- 2.1. In order to facilitate best practices of service accessibility and inclusive design, these guidelines were developed in consultation with state authorities, nongovernmental organizations and third-party service providers for e.g. user authentication, payment authorization services and also linguists and designers.
- 2.2. These guidelines represent the commitment of the members of the Finance Latvia Association to provide inclusive and accessible banking services to all.
- 2.3. The members of the Finance Latvia Association who represent the majority of the banking sector have committed to guarantee accessibility of retail banking to everyone, including persons with disabilities.
- 2.4. It is anticipated that in ensuring accessibility of banking services and in developing the surrounding infrastructure, such actions will indirectly also cover services that are out of the scope of retail banking.
- 2.5. If any member of the Finance Latvia Association – a bank does not service private individuals and its business model is targeted at servicing only corporate clients, these guidelines may be equally applied by the association's member as a corporate client may be represented by a person with disabilities. The introduction of this approach depends on the specifics of the particular bank.
- 2.6. These guidelines do not apply to those members or associate members of the Finance Latvia Association who are not subjects of the Directive or whose operating specifics are significantly different. If any of these members or associated members is subject to the Directive, it undertakes to respect these guidelines in the respective part (e.g. apply the requirements attributable to contracts or websites without introducing the requirements for ATMs, if there is none).
- 2.7. If the bank's communication channels or other resources are shared with other companies belonging to the same group equally vis-a-vis the consumers, the members and associate members of the Finance Latvia Association should implement these guidelines with regard to all shared channels and resources even in case the Directive does not oblige them to do so.
- 2.8. These guidelines were approved by the council of the Finance Latvia Association, decision of 13 April 2023 No.3-2/4.

1. Universal Design Principles

- 3.1. Banks adhere to the universal design principles both in physical environment (e.g. bank's branch offices, queue management systems, ATMs) and also at its websites, mobile applications, online banking tools. If any of the requirements listed below applies to the website, it is equally applicable to online banking.
- 3.2. The principles of universal design are rather abstract and do not comprise technical standards. Universal design represents an overall standard development trend and thus

differs from technical standards and descriptions that undermine the flexibility needed for the banks to adjust to new technologies. Universal design were possible stands for inclusive design.

1

PRINCIPLE

Equitable use: the service is useful and accessible to people with diverse abilities.

- All users have equal possibilities to use the service in terms of quantity and content, whenever possible and where it is not possible – such use is at least equitable.
- The user does not have to take any additional actions to access the content.
- The terms of use and explanatory statements e.g. privacy policy, is equally accessible to all users.

- 3.3. An illustrative example of this principle could be a website that is designed in a manner that accommodates the needs of all users, including people with visual impairments and also persons that use assistive text into speech technologies, e.g. individuals with complete vision loss.
- 3.4. If the general terms of service are published in a separate file, e.g. in *pdf* format, check that in creating the file the machine-readable format has been retained to enable that a person with visual impairments or complete sight loss can acquaint with the document using assistive text to speech technologies.

2

PRINCIPLE

Flexibility in use: the service is designed in due respect for diversity.

- The service is equally accessible to individuals who predominantly use left hand for accomplishing everyday tasks.
- Information input made easier, for example, by reducing the possibility of errors in filling in electronic data fields.
- With due respect of the security requirements, the service is adapted to assistive technologies allowing adaptability to the user's pace.

- 3.5. If the client has to complete an online form to receive the financial service, ensure that the form can be filled out e.g. by visually impaired and blind people.
- 3.6. To make completion of such forms more user-friendly, the bank may introduce immediate input validation controls, for example, if letters or other non-numeric symbols are inserted in the "phone number" field, information on such inconsistency will be displayed immediately and not after completing the form.
- 3.7. Given that an individual with hearing disability cannot communicate with the bank over the phone, the bank may offer instant chat or video service option. E-signature and video conferencing on their turn can be used for servicing individuals from social care centres, considering the difficulties in arranging individual visits to such persons or taking them to the bank, provided the care centre can accommodate them with the required tools.
- 3.8. Face-to face servicing at the bank and video conferencing are comparable and equally relevant forms of service. For instance, a deaf person may require a sign language interpreter whereas a visually impaired – a voice activated function. Video mode, where necessary, should be used to undermine the risks of identity theft and fraud. During online servicing the client may be accompanied by a support person. The term "support person" is explained and the regulations on its presence are described further under Item 9 of these guidelines.

3

PRINCIPLE

Simple and intuitive use: the process of using the service should be easy to understand, regardless of the user's experience, knowledge or concentration level.

- Eliminate unnecessary complexity.
- Consistency with approaches that are habitually used by persons with disability to receive service or acquire information.
- Effective prompting and feedback during and after task completion (e.g. if the provided e-mail address is erroneous, the user receives immediate message that this section contains an error, instead of receiving a general error report).

- 3.9. An illustrative example of this principle could be a banking token (OTP) with well-marked digits and easily comprehensible symbols.
- 3.10. Do not design solutions for services without consulting the specific target audience and respect the “Nothing about us without us” principle. For example, visually impaired persons will best explain the most preferred form of receiving the relevant service and therefore cooperation with organizations that represent different social groups is of vital importance.
- 3.11. Filling out of electronic forms can be made more user-friendly by timely error reporting and by providing reference that the field has been filled out correctly and in accessible manner (e.g. using not only colours) and stating that the input data are valid/precise/correct.

4
PRINCIPLES

Perceptible Information: information is drafted in a manner to effectively reach the addressee.

- Use different modes (illustrations, verbal/audio information, pictograms) for communicating essential information.
- Provide adequate contrast between essential and less important information.
- Maximize legibility and visibility of information essential for receipt of the service.
- Provide compatibility with a variety of assistive technologies (PC, operating systems, search engines, standard assistive tools) that are commonly used by the specific target audience.

- 3.12. An illustration of this principle could be a video material with audio function and subtitles.
- 3.13. It is not recommended to use colour as the only means of highlighting important messages on the bank’s website as it may remain unnoticed by persons unable to perceive colours. For highlighting information, apart from colours, use other means, e.g. font, size, bold text. Remember that italicized and underlined text are not the best forms of emphasis.
- 3.14. Apart from textual highlights and font size, the content can be made more precise by breaking the text into paragraphs. Subheadings can equally make a long text better readable and perceivable.

5
PRINCIPLE

Tolerance for error: the services are designed so that to minimize user’s hazards of accidental and unintended actions.

- Arrange contextual elements to minimize user’s risks and errors (incl. by accident, e.g. deletion of entries caused by too sensitive navigation between fields).
- Provide warnings of hazards and errors.

- 3.15. An illustrative example of this principle could be an intuition-based online banking interface preventing accidental and unintentional actions. For example, to prevent the likelihood of a client willing to approve a certain payment cancelling it by accident instead do not place the “Approve” and “Cancel” buttons for payments next to each other.
- 3.16. The web pages that contain electronic forms should display a warning that in case of leaving the site any incomplete submissions will be deleted. To prevent such accidental loss of data before closing the page, the option to complete the form should be offered to the client.

6
PRINCIPLE

Low physical effort: services are designed so that they can be used comfortably and with a minimum of fatigue.

- To the extent possible minimize repetitive actions.
- Minimize sustained physical effort or the number of actions that are required to receive the service (e.g. at the bank’s office).

- 3.17. It is not recommended after connecting headphones to the ATM to make the client perform additional actions to switch to the accessibility mode. The ATM voice assistance should switch on upon plugging headphones into the ATM’s headphone jack.
- 3.18. Banks with sliding doors make entrance to the bank easier for all, however for individuals with physical disability it can be the only possibility of entering the bank.

7 PRINCIPLE

Size and space for approach and use: service accessibility and use are ensured with due respect of individual's abilities and limitations, e.g. physical limitations.

- Place all components required for receiving the service within physical reach.
- Ensure that all equipment and tools required for receiving onsite service are within the individual's reach.
- The individual can use all required assistive devices and there is adequate space for placement of such.

- 3.19. This principle foresees the necessity to provide sufficient space for approach, accessibility and required use, irrespective of individual's physical parameters, e.g. height or mobility. The customer service area should ensure sufficiently comfortable servicing of persons in wheelchairs. High tables are not suitable to everyone.
- 3.20. When installing an ATM, choose a location that makes the ATM accessible not only by someone standing but also to individuals using wheelchairs. ATM buttons should be reachable, and the height of the display screen should be within sight of people sitting in wheelchair.
- 3.21. Where complete implementation of the universal design principles at the current stage is impossible, reasonable adjustments should be introduced, e.g. a lift that takes a person in wheelchair to the necessary area and thus ensures environmental accessibility, nevertheless this solution is not consistent with the principles of universal design.


2. Easy-to-understand service agreements

- 4.1. This section contains recommendations for making written information better, faster and easier to understand. This can be achieved by limiting each sentence to a single thought. Use plain and easy language for textual accessibility.
- 4.2. Plain language is a way of writing that is easy to understand also by people **without legal education** or industry **specific knowledge**. However, it does not imply abandoning of legal terminology or omitting of mandatory information that must be provided under the law, as no contract may exist without legal concepts or be contrary to the law. If the terms used in the contract are defined, the content will be understood by a larger audience.
- 4.3. Easy language is used to write information for persons with intellectual disability or poor language skills. It is not intended for legal writing but is a form of getting the message of the legal text across to the recipient. This is an additional alternative considering that in case of a severe disability no simplification of a legal text will allow attainment of the intended purpose – informing the person on the substance of the contract. Easy language means using simple unextended sentences containing not more than 10 words. It aims to provide an overview on the subject matter, main duties and responsibilities of the contract. Easy language may be supplemented with visual materials.
- 4.4. Draft a text that is simple, clear and concise. Avoid complex structures and long sentences where possible, write correctly, be laconic and precise.
- 4.5. When using plain language, limit each sentence to a single thought and write clearly and concisely.
- 4.6. Remember that not every person with disability will understand a contract even if it is written in plain language. It is important to have access to one or several banking specialists that can explain the subject matter of the contract in easy language. The on-site and online customer service should provide respective consultancy and information on this option should be available when scheduling an appointment with the bank.
- 4.7. The recommendations for legal drafting in plain language are split in two groups – layout design and content formation methods.
- 4.8. Layout design recommendations:


- **the text is structured** and written in a manner that makes it easy for the reader to find and understand necessary information;
- information sequence **is adjusted to the reader**;
- **short** sentences and paragraphs (up to 35 words);
- textual layout makes **it clear and easily perceivable**;
- recommended font size: 10–14 pt;
- recommended fonts: *Arial, Calibri, Helvetica, Verdana*; avoid fonts like *Times New Roman, Garamond, Cambria*;
- recommended letter sizing (height): at least 1.5–1.75 mm;
- recommended paragraph and word spacing: at least 2 mm.

4.9. Recommendations for content creation:

- Use active voice whenever possible;
- Explain concepts and legal terms that are not used in everyday language;
- Translate or avoid Latin phrases and expressions;
- Limit each sentence to one thought/action;
- Abbreviations are not prohibited but should not be confused with other terms used in the text.

 <p>IMPORTANT</p>	<p>Good practice:</p> <ul style="list-style-type: none"> ▪ wide target audience ▪ reduced time required for reading the text ▪ concise and precise language ▪ use of active verbs ▪ active voice (text created from the client's, instead of the bank's perspective) ▪ shorter sentences, listing ▪ simple and concise words ▪ sentences starting with subject matter followed by the predicate ▪ sub-headings, clear enumeration 	<p>Bad practice:</p> <ul style="list-style-type: none"> ▪ limited target audience ▪ reading and understanding the text takes a lot of time ▪ overused phrases ▪ redundancy ▪ passive voice ▪ long and complex sentences ▪ too many terms and jargon words ▪ a lot of abbreviations ▪ sentences are not started with the subject and not followed by the predicate ▪ contract clauses or sub-clauses consist of several unstructured paragraphs
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4.10. Before writing a text, think first **what you want to communicate**. If the purpose is achieved, evaluate what reader's actions can be **expected in the future**.

 <p>ADVICE</p>	<p>Tips for improving text design:</p> <ul style="list-style-type: none"> ▪ avoid placing a table within another table; ▪ do not use table format for contracts as many narrow and nearby line separated rows make the text cumbersome to read; ▪ use bold text only for important information and do not emphasize more than 2-3 words; ▪ use italics only for foreign words; do not italicize text in quotation marks; ▪ do not use hyphen instead of dash for numerals (for example, "2–3 months"); do not insert a space before and after the dash; ▪ incorporate supplementary information in the text instead of using brackets. Authors, willing to share as much as possible of what they know, tend to include in one sentence maximum amount of information and use brackets for structuring it. At times such contextually oversaturated texts lose the main idea and it can no longer be traced.
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4.11. In a sentence specify the doer and the action (who, what, when, how long) and desirably structure the sentence so that the subject is followed by the predicate.

4.12. When using plain language, avoid **starting a sentence with a subordinate clause**. The text should be clear and concise.

- 4.13. **Split long sentences** into two or three shorter sentences or alternatively turn into a list of actions.
- 4.14. Avoid using words with the same root (e.g. beneficial benefits) next to each other or separating contextually linked words (for example, do not place one word after the subordinate clause, but instead place it before the subordinate clause).

 <p>EXAMPLE</p>	<p>DO NOT write:</p> <p>On the date of the Contract the total outstanding amount payable by the Borrower to the Bank.</p>	<p>Write:</p> <p>The total amount outstanding and payable by the Borrower to the Bank on the date of the Contract.</p>
 <p>EXAMPLE</p>	<p>DO NOT write:</p> <p>The management fee is calculated per each day and the Client's Portfolio is debited for the given amount on a quarterly basis in accordance with the terms of payment set out in the general terms of the Contract.</p>	<p>Write:</p> <p>The management fee is calculated per day. The amount payable is deducted from the Client's Portfolio on quarterly basis. The fee is paid in accordance with the terms of payment set out in the general terms.</p>
 <p>EXAMPLE</p>	<p>DO NOT write:</p> <p>[...] <u>A construction permit</u>, that is issued in accordance with the statutory procedure for the construction of the building and contains a confirmation of the construction authority on satisfaction of the planning and construction requirements; a copy thereof (by presenting to the Bank the original) [...]</p>	<p>Write:</p> <p>[...] <u>A copy of the construction permit</u> issued for construction of the building in accordance with the statutory procedure. The original of the permit has to be presented to the Bank. The construction permit contains a confirmation of the construction authority on the satisfaction of the planning and construction requirements [...]</p>
 <p>EXAMPLE</p>	<p>DO NOT write:</p> <p>The Bank undertakes within 2 (two) business days following satisfaction of the conditions precedent for receipt of the loan under the Bank's loan agreement and provided the pledge in favour of the Bank is registered with the authority and no entries in favour of any third persons (with the exception of the Creditor's pledge) that could encumber enforcement of the Bank's pledge are registered to the Collateral, transfer the Final estimated amount indicated in the Creditor's notice in the currency of the Final estimated amount to the Credit account and where necessary, convert the currency using the currency exchange rate set by the Bank for the payment date, by indicating the purpose of the payment. If the Creditor receives the amount that is indicated in the Creditor's notice more than 3 (three) business days</p>	<p>Write:</p> <p>The Bank shall disburse the Final estimated amount indicated in the Creditor's notice within two business days after satisfaction of the Bank's conditions precedent for receipt of the loan. The payment is made if the following conditions are satisfied:</p> <ol style="list-style-type: none"> 1) there is a valid pledge in favour of the Bank registered with the relevant authority; 2) there are no other encumbrances in favour of third persons that could encumber enforcement of the Bank's pledge with the exception of the Creditor's pledge. <p>The amount is paid to the Creditor's account in the currency of the Final estimated amount. Where necessary, the amount is converted into another currency using the currency exchange rate set by the Bank on the payment date. Indicate the purpose of the</p>

after the date of the Creditor's notice resulting in an increase of the Borrower's obligations under the Creditor's loan agreement, the Bank, acting jointly with the Borrower shall take necessary measures to ensure that the incurred difference is paid to the Creditor within one day following the Creditor's request to this effect.

payment. The Bank shall act jointly with the Borrower to ensure that any difference is paid to the Creditor within one day following the Creditor's request, in case,

- 1) The Creditor receives the amount specified in the Creditor's notice more than 3 (three) days after giving the Creditor's notice;
- 2) Such a payment delay has resulted in an increase of the Borrower's obligations under the Creditor's agreement.



DO NOT write:

[...] the payment due from the Borrower to the Bank under the Contract, including, but not limited to the principal amount of the Loan, interest, bank's charges and contractual penalty.

Write:

[...] the payment due by the Borrower to the Bank under the Contract also includes the principal amount of the Loan, interest, bank's charges and contractual penalty.

- 4.15. In legal writing the phrase "has the obligation" or "has the right", depending on the context may be replaced by the words "the client or the bank [action]". When using words "is responsible" or "is not responsible" be sure of the meaning, namely, is it a matter giving raise to civil liability or it is about the duty to accomplish some task (send, track, monitor, clarify). It is not recommended to use "to be responsible" if the context implies a duty or a specific action.
- 4.16. There is no need to use "should or need to be" contextually with legal requirements as they have to be satisfied notwithstanding that they are written in indicative mood. Neither contextually nor stylistically there is room for the use of the word "need" (see examples) in laws and regulations.



DO NOT write:

Unless otherwise specified in this Agreement, all amendments thereto need to be in writing and duly signed by the parties.

Write:

Except as otherwise provided in this Agreement, all amendments are made in writing and duly signed by both parties.



DO NOT write:

The operation with the card shall be considered as authorized.

Write:

The payment transaction is authorized.

- 4.17. The terms of a contract are explained to a person with disabilities similarly as to any other client, however the bank should take note of the specific nature of certain limitations. The law may require witness signatures, for example, in case the client cannot or is physically unable to write. For a deaf client, the bank's employee will explain the terms of the contract during the appointment and/or send an electronic version of the document to the client before visiting the bank or afterwards so that the client can acquaint with the document by means of appropriate technological solutions.

3. Authentication devices

- 5.1. The authentication devices that are covered by this section are one-time password generators (tokens) provided by banks that are used to access online banking and make payments and smart authentication tools – most commonly those are mobile applications provided by the bank itself or by a third-party service provider.
- 5.2. Considering the prevailing needs and solutions available on the market, banks offer **alternate authentication methods** as persons with disabilities experience difficulties or are unable to use the standard authentication devices. Such alternative methods can be useful not only for persons with disabilities but also for elderly people and persons with movement and coordination disorders.
- 5.3. Alternate authentication tools can include, for example, large format bank tokens with large buttons or devices with **audio function** equipped with headphone ports. The demand for such devices, nevertheless, remains low because customers rather prefer adjustments to standard authentication devices (e.g. screen reader applications).
- 5.4. In the light of the fact that frequently clients are not even aware of the existence of diverse authentication tools, banks should proactively inform them on the availability of such tools and assist in selecting the most suitable solution.
- 5.5. Considering that one of the disadvantages of authentication devices is the processing speed, banks should think of the possibility to **extend** the time that is devoted by the authentication device for completing specific operations, nevertheless without **abandoning service security requirements**.
- 5.6. After assessment of the available solutions, the bank may also suggest authentication through a mobile application with a screen reader instead of using a specially tailored device (this option could, for example, be used also by visually impaired or individuals with complete vision loss).
- 5.7. In order to make online payments, the following card details are required: the number of the card, validity term, user's name and surname and the verification code (CVC code). Thus, given the technological possibilities and risk assessment, banks offer its clients - individuals with visual impairment or complete vision loss the possibility to access their card data (card number, PIN code, CVC code) without third-party assistance, for example, by granting access to such information through online banking or bank's app allowing the individual to listen to such information using a screen reader or otherwise.
- 5.8. Remember that due to person's health condition an individual might be deprived of the possibility to make a physical visit to the bank. To ensure presence identification, the state may be required to ensure electronic identification either by the Office of Citizenship and Migration Affairs making home visits or alternatively engage a notary public or family court to issue a power of attorney for representation before different organizations, including banks.
- 5.9. In accordance with the bank's risk assessment that is carried out in accordance with the applicable laws, the bank has to grant its clients access to information on the devices referred in paragraph 5.2 of these guidelines and also inform on the risks associated with alternative authentication tools and the possibilities for reducing such risks.

4. Self-service terminals

- 6.1. The self-service terminals covered by this section include automated teller machines, payment terminals (POS), queuing systems and Internet banking kiosks located within the bank's premises.
- 6.2. Please be aware that the availability of these terminals in bank's premises not always depends on the will of the bank. The installation of an ATM machine requires compliance with the effective construction standards. This aspect should be taken into account in view of paragraphs 6.3. and 6.4 of these guidelines.

- 6.3. The banks offering cash withdrawal services at ATMs owned by the bank, where possible should ensure access to ATMs for individuals with physical disabilities, for example, ensure that the keypad of the ATM machine is within the reach range, i.e. at a height not exceeding 122 cm and no lower than 38 centimetres.
- 6.4. The area in front of the ATM machine should be **sufficiently wide** for wheelchair access and the surface should be firm and flat. The ATM area should be **free of any barriers and obstacles** to allow easy approach for individuals using mobility aids, for example, a wheelchair.
- 6.5. A **voice – guided technology** should be installed on the automated teller machine. Namely, the ATM must allow the individual to plug in headphones for customized audio and volume control.
- 6.6. The person using an ATM with headphones plugged in **should not be required to take any additional measures to activate the voice guidance tool**, i.e. the bank should ensure that the voice assistance starts automatically after plugging the headphones into the ATM.
- 6.7. In order the person using voice assistance would be informed on the bank – owner of the particular ATM, the name of the bank should be provided upon activation of the voice assistance.



EXAMPLE

Information that should be provided after plugging the headphones:
 “Hello! You are using the ATM of “SAMPLE” bank!”

- 6.8. The numeric keys of the ATM should be arranged in ascending or descending order.
- 6.9. The functional buttons should be in visual contrast to the ATM display screen.
- 6.10. If the functional buttons are placed on a touch screen, when pressing the button for the first time the person using the audio guidance should hear information on the function of the button and the required function should be performed only when the button is pressed for the second time.
- 6.11. If the bank operates several ATMs at the same location, e.g. at a shopping mall, the accessibility requirements are satisfied in case **at least one** of these ATMs is fully consistent with these requirements. In such case the bank introduces uniform elements for recognition of accessible ATMs (for example, single layout concept or another appropriate criterion at the bank’s discretion) that is incorporated in the service description accessible to the individual.
- 6.12. In locations containing ATMs of several banks, it is recommended to use bank’s visual branding elements to allow identification of the bank’s ATMs, e.g. based on colour, name or logo that can be noticed also by visually impaired persons.
- 6.13. In order to plan ATM network layout and ensure fulfilment of the accessibility requirements at least for those ATMs that are located within a specific area that is most used by persons with disabilities, the bank may conduct a survey among persons with disabilities or consult their representatives (societies, associations, representative groups).
- 6.14. If the bank provides retailers with point-of-sale terminals (POS) it must ensure that such point-of-sale terminals are accessible to people with disability, for example, are equipped with built-in audible signals indicating that the transaction has been successfully completed or alternatively - declined. The retailer and not the bank is responsible for placement and use of the terminal. The bank informs the retailer on the accessibility requirements and incorporates a respective compliance clause in the mutual agreement.
- 6.15. For people suffering from arthritis and other rheumatic disorders it might be cumbersome to insert and withdraw a payment card from ATM. Banks are encouraged to introduce alternative ATM transaction solutions, e.g. contactless readers.
- 6.16. Banks may issue customized payment cards allowing visually impaired or blind individuals to identify their payment cards, e.g. by embossed card number or other card specific details.

- 6.17. If the bank uses colours to differentiate between payment cards, it is recommended to use a different colour for every card type. The colour should be chosen so that the user would notice the difference between various cards. It is not recommended to use different shades of the same colour.



Minimum ATM accessibility requirements:

- Large size and sufficiently visible keys and display screen
- Screen brightness at least 200 nits (may have manual screen brightness adjustment option as per the user's preferences)
- Braille keypad (another alternative solution may be offered, e.g. key layout and audio function as not all visually impaired use Braille)
- Headphone plug in for personalized volume control
- Possible repetition of audio instructions, notices and warnings
- ATM height adjusted to people in wheelchair
- ATM access adjusted to people in wheelchair
- Automatic door opening system if the ATM is located behind doors.

5. Digital content

- 7.1. This section contains recommendations for website and mobile application content creation. These recommendations should be taken into consideration also for the development of new digital services, irrespective of whether the service is received via PC or smart device (phone, tablet).
- 7.2. Web accessibility means that people with disability **can perceive** and understand the content, navigate and interact with the website.
- 7.3. Any text that is placed in digital environment is subject to the same plain language principles as document drafting (see section 4).
- 7.4. Banks may follow various international guidelines, e.g. WCAG, W3C, WAI and best practice standards in developing, updating and improving websites and mobile applications. The Ministry of Environmental Protection and Regional Development of Latvia for example has elaborated and published guidelines for "Website assessment according to Web Content Accessibility Requirements" (WCAG 2.1 AA)" available free of charge under: pieklustamiba.varam.gov.lv.
- 7.5. Knowing the primary purpose of keeping websites up to date, banks should pay particular attention to the most important banking services, e.g. payment services and to other **most frequently visited** sections of the website. To achieve the same, banks conduct regular website traffic analysis and set the frequency of such measures in their internal regulations.
- 7.6. Web accessibility is vital as it contains a wide range of information. Inaccessible web content means that people with disabilities are denied equal access to information. An inaccessible website can limit service accessibility just as much as steps at an entrance to a physical location.
- 7.7. Digital content accessibility requirements are attributable not only to bank websites and electronic messages but also to content made available through third-party providers and the content on smart devices (tablets, smartphones) including mobile applications. Such services should be based on the most commonly used smart device operating systems as it will be impossible to introduce adjustments to all possible systems.
- 7.8. When placing content on third-party platforms (e.g. promotion on *Facebook*, *Twitter*, *Instagram*, *TikTok* etc.) the bank has to ensure accessibility of such content to the extent the bank may affect placement of such content on third-party platforms.



Persons with disabilities use different tools to access the Web. Visually impaired may use device integrated **screen readers**. Deaf and hard of hearing individuals may use closed captions (see cases referred in item 7.15). Persons with mobility impairments who cannot operate the mouse may use **voice recognition** software to give verbal commands to their PC and other devices.

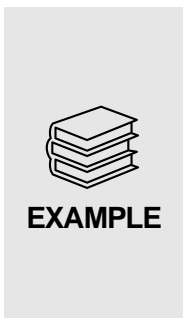
- 7.9. People with visual impairments (including colour blindness) have difficulty reading and perceiving a text that has insufficient colour contrast between the text and the background. It is not recommended to use non-contrasting colour combinations.



Insufficient contrast
(Contrast ratio 1.95:1)

Sufficient contrast
(Contrast ratio 19:1)

- 7.10. Proper colour contrast is important for accessibility. The readers, visually impaired persons among them, must be able to perceive the content.
- 7.11. The larger the text size, the better the visibility and vice versa. It is recommended to use a contrast ratio of at least 7:1 for average and small text items and at least 4:5:1 to larger texts and 3:1 to other graphical elements, except for corporate visual identity and graphical standard elements.
- 7.12. When using colours for text emphasis (for example, font colour red for mandatory fields) remember that there are people unable to perceive colours and that a better option would be to refer to such fields as “mandatory” or mark with asterisk (*).
- 7.13. To make information input easier for visually impaired or blind persons who use screen readers the bank should ensure that the screen reader informs the user on mandatory form fields.
- 7.14. Alternative text describes a visual appearance, image, illustration, diagram etc. in words making such information accessible to visually impaired who use screen readers to transform the text or image content as speech output. For alternative text to be useful it must be **short and descriptive**.



- 7.15. Videos are made accessible by adding closed captions that are precise and identify all speakers. Any videos that are not associated with service accessibility and promotion are not mandatory, however it is advisable to add closed captions to such materials as well.
- 7.16. Banks should ensure that all video materials that explain the use of financial services and contain content allowing users better understand the scope of the provided services are equally accessible to deaf and hard of hearing by adding closed captions.
- 7.17. Labels, access to keypad and precise instructions are important to ensure accessibility of forms. For blind individuals using a screen reader labels help understand what should be done with each form field, for example, explain what information is included in each box of the job application form.
- 7.18. It is important to reassure that persons using screen readers are automatically and timely informed on any errors in filling in any forms. It means a clear reference to the specific error and guidance on how to correct it (e.g. automatic error message on incorrect date format).

- 7.19. Responsive design is a constituent part of the universal design. It is attributed to special websites and stands for an approach to web design that allows a website to adapt to different devices and screen sizes from the smallest up to the largest possible screen size. The purpose of responsive design is to ensure accessibility and optimize experiences.
- 7.20. When using a keyboard, the links, controls and buttons **should be interactive**. Keyboard accessibility means that persons with disability can use tabs instead of a mouse in order to navigate page content.
- 7.21. If the bank's website uses a virtual banking assistant that opens automatically without requiring active user's involvement **the bank should ensure easy and accessible disabling of such assistant**, especially for individuals who use a screen reader to navigate the website.
- 7.22. Automated accessibility testing tools that help identify accessibility issues on websites may be useful however **should be relied upon with due care**. A positive report does not necessarily mean complete accessibility and a report catching several errors will not always mean that there are accessibility problems.
- 7.23. Combining of manual accessibility testing with automated testing tools **can give a better overview** on the accessibility of the website.
- 7.24. It is crucial to introduce a **simple and easy-to-use** reporting tool for the users to **report** on website accessibility issues or to give recommendations for improving web accessibility.
- 7.25. **Alternatives** should be provided for images, video and audio content. For example, a video tutorial on how to change the authentication device should be provided in text and audio format as well.
- 7.26. It is not recommended to use colour as the only **eye catching and highlighting element** of web design or other visual materials, e.g. always placing the words "special offer" in red because otherwise it will remain neglected. Use different forms for emphasis, if the information might be inaccessible in any of them.
- 7.27. Websites and mobile applications **should not** automatically play audio or sounds **without the user's consent or interaction**, as it might confuse a blind person.
- 7.28. To the extent technically possible, the requirements that are attributable to websites should equally apply to online banking and mobile applications used for making payments.

6. In-person banking services

- 8.1. This section contains recommendations to banks servicing clients in-person at the bank's offices.
- 8.2. Each **client is valuable** and deserves special treatment and attention to jointly achieve increasingly better performance. Only successful **cooperation** with clients will allow the bank to achieve its goals.
- 8.3. Bank publishes on its website information on the bank's offices and other service locations that are accessible for consumers with disabilities, particularly for individuals with movement disorders. Such information is provided even in case all bank's offices satisfy the accessibility requirements.
- 8.4. If a person schedules an appointment with the bank, in order to prepare for the visit, the customer service specialist may inquire on the need for any special aid or adjustments for the person with disability (e.g. sign language interpreter, support person). Please remember that the customer him/herself assesses the situation, his/her abilities and the necessity for a support person.
- 8.5. When evaluating the provided information, please consider that apart from movement disorders, the customer may require assistance due to hearing impairment (deaf interpreter), visual impairment or that exposure to bright light **may cause discomfort** or anxiety in people suffering from light sensitivity.

- 8.6. If the client is a person with hearing impairment and has indicated it as a significant condition, it is recommended to service the client in a quiet place with no background noise (e.g. a separate room). In case no other solutions are available, based on the specifics of the room, an FM system or similar device can be used. An in-built hearing loop may not suit for all bank's offices, however portable induction loops can provide hearing assistance for serving individual clients. The most suitable solution should be based on the specifics of the premises.
- 8.7. A proper entrance to the bank that satisfies the accessibility requirements laid down in the building laws and codes should be accessible to people with movement disorders, e.g. automatic doors, street level entrance or access ramps not requiring considerable effort of wheelchair users.
- 8.8. The bank may require **scheduling a previous** appointment and notifying the bank on any special service or adjustments due to disability or alternatively provide for the possibility to call for assistance immediately after arriving to the bank. Based on the specifics of each case, **the bank will provide staff** that can welcome the client, clarify his/her needs and where necessary, accompany the client to the service or waiting area. It not necessary if the client is accompanied by a support person.
- 8.9. The bank's queue management system should be easily assessable via **more than one sensory channel**. For example, the physical buttons of the queue management system should have elevated surface or Braille labels granting visually impaired individuals the possibility to get a queue number. The queue management system can be equipped with voice assistance or have the option to **read the number out loud**, however the benefits of this solution in terms of improved accessibility should be considered as it may cause constraints to other individuals, including persons with other forms of disability.
- 8.10. It is recommended to use large size icons and numbers with sufficient background contrast (e.g. do not use red text on black background) and a contrast ratio of at least 3:1. In case smaller size symbols are used the **contrast ratio should be increased** accordingly. Before serving a particular number, the bank may read it out. Such a solution may be ensured by the queue management system or the bank's employee may call out the number.



BAD EXAMPLE			
Now serving 568			
268	311	310	568

GOOD EXAMPLE			
Now serving			568
268	311	310	568

- 8.11. Bank's employee **may not presume** that the person with disability is unable to take independent decisions (e.g. to take/not take a loan). In all cases the will of the individual prevails, unless there are obvious signs of suspicious or untypical activity (e.g. third-party impact).
- 8.12. In order to properly serve persons with disability, banks should constantly keep them up to date on the recommendations issued by authorities and various organizations, e.g. the Ministry of Welfare of Latvia has elaborated recommendations for communication with people with disabilities that are [available on the ministry's website](#).

7. Support persons

- 9.1. This section covers issues pertaining to clients who use the assistance of support persons to arrive to the bank or receive the service.
- 9.2. The term "support person/worker" is not defined in the law and is used as a general concept in these guidelines. The regulations on state support to persons with disabilities refer to personal assistants and accompanying persons, nevertheless, this legal framework does not cover participation of these persons in receipt of banking services. According to the existing practice, there are support persons involved in decision-taking and it is intended to incorporate this concept also in the law. Banks tend to use a wider understanding of these terms, being

aware that clients with disability or without a formally recognized disability but having certain disorders may require support both for arriving to the bank and also for receiving the service. When sticking strictly to the person's formal status allocated under the social laws, many situations may remain out of the scope, e.g. in the event the role of the support person is taken by a family member. For the purpose of these guidelines the term "support person" means any person rendering assistance to a person with disability or functional disorders for it to be able to arrive to the bank, reach bank's staff and have effective communication with the bank, including cases when the accompanying person gives the client the feeling of safety.

- 9.3. Support persons may be divided into several groups per function and status. Firstly, there are support persons who only perform the accompanying function, namely, assist the client to get from one place to another. Secondly there are support persons whose task is to provide the client with support services necessary for decision taking in order the client (and not the support person) could take the decision independently. The support person can be hired by the state, registered with public registers or privately hired. Thirdly the functions of support persons, irrespective of the description assigned to them by the law or any other documents, may depend on the form of disability and needs of the specific client. In the majority of cases the support person will be a companion and take no involvement in receipt of the service, however each case requires individual assessment. There might be one support person for several persons with disability or other limitations.
- 9.4. If the client wants to be served in the presence of the support person, the bank, **acting in the interests of the client** and with the aim of preventing any illegal acts, has to reassure on the reasonableness of such presence, inter alia **to prevent** any possible **abuse** of client's trust.
- 9.5. Be aware that a person with disability may require a support person helping him/her to get to the desired destination and receive financial services in the best available way. Thus, the bank **must be able to distinguish between different situations** and commonly not prohibit persons with disability to have support persons assisting them. The risk of any potential harm to the client is assessed on a case-by-case basis. If the support person has any official status, it may be treated as a risk reducing factor, however the availability of such a status may not be introduced as a mandatory requirement for all cases.
- 9.6. It is presumed that every individual has full legal capacity unless certain limitations to the person's legal capacity **have been imposed by the court**. The fact that a person requires support services or assistance does not imply automatic loss of legal capacity. The bank's staff servicing a person with disability may check external sources¹ for any legal capacity limitations and in the future conversation with the client clarify additional details and the substance of such limitations. No presumptions regarding limited legal capacity should be made while talking to the client. If the provision of any service to the client is refused, it must be based on other circumstances and not the employee's presumption that the legal capacity of the client should be limited.
- 9.7. The client **acts on his own and makes own decisions**. The support person neither has the duty nor the right to interfere. The will and preferences of the client have priority. If the support person attempts to affect decision-making, namely, tries to convince the client to act otherwise, such behaviour may be treated as unusual. The support person may not take decisions or give any instructions to the bank on behalf of the client. Moreover, the client **has to demonstrate willingness to use and receive** the service and give respective instructions to the bank.

¹ E-service "Information on person's legal capacity". Currently there is no access to the service by banks as legal entities and only its employee acting as a natural person can access the service. As long as the state will not introduce necessary adjustments the use of this service could be cumbersome, available under: <https://epak2.pmlp.gov.lv/#/PersonCapacity>



Example of excessive control: the bank always demands from the client a notarized power of attorney for the support person or demands that any document that is signed by the client would be also signed by two witnesses or that the person's legal capacity should be restricted, and a legal guardian would be appointed.

Example of excessive control: the bank requires a contract between the support person and the person with disability that is duly registered with state authorities.

Example of insufficient control: the bank pays no attention to the support person's unusual behaviour, although such signs of unusual behaviour should not be neglected even in case the support person acts on the basis of a notarized power of attorney.

Example of adequate control: if the bank's employee is of the opinion that the support person is overly involved in receipt of the financial service or decision-making, it may request it to wait for the client in the waiting area, however, in this case the bank's employee must know how to act considering the disability of the particular client.

- 9.8. If the client does not object to the presence of the support person, the bank's employee should address the client and not the support person as an intermediary. If all present consent thereto, the bank acting in accordance with the principles of **risk-based approach**, may register the presence of the support person and identify the person.
- 9.9. Support persons commonly accompany persons with visual impairment or movement disorders. A person with hearing impairment may be accompanied by a sign language interpreter. An individual with mental disorders may be accompanied by a support person for rendering professional social service. The bank should treat a sign language interpreter equally as any other interpreter, e.g. in cases when foreign language skills are required. The banks may engage in different forms of cooperation with nongovernmental organizations.



IMPORTANT for addressing a person with disability:

- **if the client is a person with visual impairments** – the bank's employee identifies him/herself, introduces anyone else who is present and reads out the text of the relevant document without raising voice. The bank's employee should physically place the client's hand at the appropriate place for signing (ask permission before you touch the person). In case there is a need to switch locations, give the client precise directions and allow him/her to be accompanied by the guide dog everywhere it is necessary.
- **if the client is a person with hearing impairment** – the bank should provide the client with the possibility to inform the bank on his/her hearing impairment in advance, or alternatively choose remote written communication. In case of a presence communication, the bank's employee keeps eye contact with the client and not with the sign language interpreter and avoids covering his/her face with hands. The employee may use appropriate facial expressions and gestures, should speak slowly without changing the pace, should not scream, remain patient or suggest communicating through writing or smart devices. Be aware that a person with hearing impairment may have literacy issues.
- **if the client is a person with developmental disorders** (e.g. autism spectrum disorders), where possible, the client is served in a separate room with no background noise, avoiding bright lights or too many other people in the room. The questions asked by the bank's employee should be short and precise (to make the client focus on a single item), do not use gestures, facial expressions, or other forms of non-verbal communication (the client may not understand it). Leave the client time for answering, if possible, ask questions in the form of a dialogue, be aware that the client's reaction might be slowed down or heightened (therefore it is important not to let him/her feel uneasy or anxious about the offered changes), You may also use written forms of communication instead. It would not be correct to "check" on the spot what the client is able/unable to do.
- **if the client has mobility impairment and sits in a wheelchair** – when talking to a person in a wheelchair put yourself at eye level instead of looking down upon the person.

8. Service development and assessment

- 10.1. When introducing a new service or reviewing the existing services according to the bank's internal procedures, the bank **performs assessment** to ensure compliance of bank's services with accessibility requirements and best practices.
- 10.2. In order to satisfy the provisions of paragraph 10.1. above, it is recommended to consult persons with disability or their representatives (societies, associations, interest groups) directly or through the Finance Latvia Association.
- 10.3. When amending service contracts at least one bank's employee or external specialist should assess compliance of the contract with plain language requirements. If the bank engages external specialists for service development, the bank should check their competence in accessibility matters in case the developed service involves mandatory accessibility requirements.
- 10.4. In developing new or optimizing any of the existing services **the bank may rely on** service compliance with accessibility requirements if the service has been developed, optimized, tested and assessed in line with the best practice and international guidelines, for example, WCAG and has involved persons with disability or their representatives (societies, associations, interest groups).
- 10.5. The bank may assume that an ATM or payment terminal satisfies accessibility requirements if the manufacturer's certificate confirms compliance with the accessibility standards. However, please remember that a compliant device may be installed incorrectly (for example, the ATM screen is placed in an angle where it is exposed to sun, or the ATM is placed at the wrong height).

9. Documentation and process descriptions

- 11.1. The bank elaborates necessary documents on the servicing of persons with disability and ensures compliance with accessibility requirements in developing new services.
- 11.2. On its webpage the bank publishes a summary (1 to 2 pages) on the measures that have been introduced by the bank to ensure compliance with accessibility requirements, containing specifically and as the minimum the following information:
 - 11.2.1. Physical accessibility;
 - 11.2.2. Digital accessibility;
 - 11.2.3. ATM accessibility, including during transition period;
 - 11.2.4. Authentication devices accessible to clients;
 - 11.2.5. Servicing of deaf and hard of hearing persons;
 - 11.2.6. Servicing of blind and visually impaired persons;
 - 11.2.7. Possibility to have contracts explained in easy language;
 - 11.2.8. Queue management in banks;
 - 11.2.9. Procedure to be followed by support persons arriving to the bank or assisting in receiving distance services.
- 11.3. The internal documents of the bank foresee that in case a complaint is lodged on the violation of the rights of persons with disabilities, a person that has been recognized by the bank as a person/entity competent in the rights of persons with disabilities and accessibility regulation should be involved in the drafting of the complaint. When reviewing the complaint, the bank verifies whether its actions in the particular case were consistent with the legal regulation, best practice and these guidelines (considering that the guidelines allow alternative options and are based upon the "comply-or-explain" principle).
- 11.4. The banks themselves or with the assistance of the Finance Latvia Association draft and publish in easy language the descriptions of the most frequently used contracts and

procedures, in particular with regard to legal remedies in case of possible violations and ensure easy accessibility of such information.

- 11.5. In order to reduce uncertainty regarding what information should be included in a power of attorney to authorize receipt of financial services and reduce the risk of fraud, the banks themselves or with the assistance of the Finance Latvia Association draft explanatory notes for all clients on how to write a power of attorney. In developing internal documentation, the banks may use the power of attorney drafting recommendations of the Finance Latvia Association² or refer to these recommendations.

10. Training

- 12.1. The bank shall ensure that its customer service specialists and staff involved in the development of new services are qualified and duly informed on accessibility requirements, specifically those attributable to persons with disabilities or temporary functional disorders.
- 12.2. Such training will be treated as qualification upgrading.
- 12.3. As per the relevant content, where possible such training should involve representatives of persons with disabilities and include simulation training.
- 12.4. When developing training programmes, the Finance Latvia Association consults with the representative organizations of persons with disabilities to ensure that banking specialists are properly trained for servicing persons with disabilities and are proficient in developing the best solutions for physical and digital accessibility.

Transition periods

- 13.1. The conformity of services with accessibility requirements is ensured in compliance with the transition periods set in the law.
 - 13.1.1. ATMs in use before 27 June 2025 remain in use until the end of the economically useful life of those terminals but no longer than 20 years after their entry into use. The banks should act in good faith and refrain from purchasing ATMs not satisfying the long-term standards shortly before expiry of the transition period. During the transition period the banks may opt not to treat ATMs as a single unit, namely, where ATM upgrades are possible, the best practice would be gradual introduction of upgrades, particularly with regard to software functionality;
 - 13.1.2. Any service contracts that have been entered into before 27 June 2025 will remain valid throughout their lifetime, however in case the contract remains in effect after 27 June 2030 the service provider must provide the client with explanatory materials consistent with the accessibility requirements and explaining the contract or agree with the client on respective amendments to meet the accessibility requirements, for example, the client requests to explain the text because he/she cannot understand it due to disability. There will not always be a possibility to make the text of the contract simple enough for it to be understood by individuals with all forms of disability, therefore it is recommended to use information sheets (with visual aid) containing information similar to the contractual information that must be provided in accordance with the consumer rights protection laws (e.g. lending agreement).
 - 13.1.3. Any websites or mobile applications that have not been updated or edited before 27 June 2025 can remain in the current version. For example, an article published in 2022 that has not been amended after 27 June 2025 may remain unadjusted, however, as soon as the text will be edited it has to satisfy the accessibility requirements. Nevertheless, it is recommended to introduce changes covering the entire website, by retaining unchanged only specific sections, if necessary.

² Finance Latvia Association – recommendations for drafting powers of attorney, available under: <https://www.financelatvia.eu/wp-content/uploads/2022/12/LFNA-ieteikumi-pilnvaru-noformesanai.pdf>

Useful resources

- 14.1. When working on service and mobile app accessibility for different groups, for example, visually impaired or blind, persons with hearing impairment, deaf or persons with mental disorders, it is mandatory to consult organizations representing such individuals and their representatives.
- 14.2. Professional associations and organizations will help best understand the existing shortcomings for service accessibility and come up with the most optimal solutions for making the service accessible as the recommendations are based on practical experience. The bank should respect the “Nothing about us without us” principle and thus facilitate cooperation and communication with different non-governmental organizations representing and protecting the interests and rights of persons with disabilities, to name:
 - 14.2.1. Easy Language Agency (www.vieglavaloda.lv | irina.melnika@vieglavaloda.lv)
 - 14.2.2. Latvian Association of the Deaf (www.lns.lv | lns@lns.lv)
 - 14.2.3. Latvian Hard of Hearing Support Organisation “Sadzirdi.lv” (www.sadzirdi.lv | olafs@tradeclub.lv)
 - 14.2.4. Latvian Society of the Blind (www.lnbiedriba.lv | info@lnbiedriba.lv)
 - 14.2.5. Riga Society of Blind and Visually Impaired “Redzi mani” (redzimani.mozello.lv | redzimani@inbox.lv)
 - 14.2.6. Resource Centre for People with Mental Disability “Zelda” (zelda.org.lv | zelda@zelda.org.lv)
 - 14.2.7. Organization of People with Disabilities and their Friends “Apeirons” (www.apeirons.lv | info@apeirons.lv)
 - 14.2.8. Society “Rūpju bērns” (www.rupjuberns.lv | ceribu.maja@rupjuberns.lv)
 - 14.2.9. Latvian Society of the Blind. Assistive Products Department (www.lnbiedriba.lv | tiflotehnika@lnbiedriba.lv)
 - 14.2.10. Latvian Umbrella Body for Disability Organizations SUSTENTO (www.sustento.lv | sustento@sustento.lv)



Finance Latvia Association

Finance Latvia Association is a public organization that represents Latvian financial industry at national and international level.

The organization brings together banks incorporated in Latvia, the branch offices of foreign banks, fintech startups, experienced technological undertakings and other companies representing sectors associated therewith.

Finance Latvia Association was founded on 23 July 1992 and is among the oldest and most experienced business organizations in Latvia.